

### REMARKS

Applicant respectfully requests reconsideration of the present application based on the following remarks.

Upon entry of this amendment, claims 1-9 and 21-24 will be pending in the application, of which claims 1 and 21 are independent.

***Claim rejections under 35 U.S.C. §102 and under 35 U.S.C. §103.***

Claims 1-3, 5, 6 and 9 are rejected under 35 U.S.C. 102(b) as being anticipated by Chida (USP 5,930,405). Claims 4, 7, 8, 21, 23 and 24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chida in view of Freeman (USP 5,396,284). Applicant respectfully disagrees.

Independent claim 1 teaches operating upon a plurality of sequential frames and storing data wherein the "data stored represents the plurality of the sequential frames stored at different resolutions." Applicant's claimed invention conserves data storage by storing sequential frames at different resolutions.

In contrast, Chida teaches storing "the portion which is necessary to be updated" of a frame when there is a difference. *See Col. 11, line 65 to Col. 12, line 19.* Thus, in accordance with the teaching of Chida a portion of a frame is stored only when a difference between two frames is detected in order to reduce the amount of data being stored. Chida teaches that "if there is no difference between two input images," then "the next whole image is inputted" and, hence, sequential frames are not stored. *See Col. 12, lines 12-14.* More specifically, Chida specifically teaches away from storing sequential frames in order to reduce "the amount of data to be stored." *See Col. 12, lines 18-19.* Thus, Chida fails to teach suggest or disclose storing data that "represents the plurality of the sequential frames stored at different resolutions" as set forth in independent claim 1. Accordingly, Applicant requests withdrawal of Examiner's rejection of independent claim 1 and full allowance of same.

Claims 2-9 and 22 depend from and further limit independent claim 1 and, hence are also in condition for allowance. Accordingly, Applicant requests withdrawal of Examiner's rejection of claims 2-9 and 22 and full allowance of same.

Independent claim 21 teaches storing the first and second group of frames such that "data associated with each of the plurality of sequential frames is stored." Chida teaches that if there is no difference between the two low resolution images, then "the next whole image is inputted" and the previous image is discarded and nothing is stored. *See col. 12 lines 12-14*. Accordingly, Chida teaches away from storing sequential frames because Chida teaches that only updates are stored at high resolution in order to reduce the amount of data that is stored. *See Col. 12, lines 7-19*. Thus, Chida does not teach or suggest storing sequential frames. In contrast, Applicant's claimed invention as set forth in independent claim 21 teaches storing "the plurality of sequential frames."

Independent claim 21 also teaches "reducing the frame storage size . . . from a larger frame storage size to a smaller frame storage size when the predetermined threshold is not exceeded . . ." The Examiner has indicated that Chida fails to teach storing images when "reducing the frame size for a first group of subsequent frames from a larger size to a smaller storage size . . ." *See Office Action Date September 27, 2005 page 4 second paragraph*. The Examiner relies on Freeman and asserts that it "would have been obvious to one of ordinary skill to compress or reduce the size of lower resolution image when there is no movement in order to save frame storage size." *See id. at page 5*. However, the Examiner has failed to point out where in the art such a combination is suggested.

Furthermore, the teachings of Freedman can not be combined with Chida to suggest or teach Applicant's claimed invention as set forth in independent claim 21. More specifically, Chida teaches away from storing sequential frames because it teaches reducing storage by storing only updates at a high resolution. Freedman teaches "generating a compound display on a monitor 64 wherein images from selected cameras are compressed and displayed simultaneously within selected portions of the monitor screen." *See Freedman at Col. 3, lines 24-27*. Thus, even if the combination of Chida and Freedman were suggested in the art, the result would be a system that stores only updates at a high resolution and is capable of generating a compound display on a monitor. Thus, the combination of Chida and Freedman as suggested by the Examiner does not teach or suggest Applicant's claimed invention as set forth in independent claim 21. Thus, Applicant respectfully requests withdrawal of Examiner's rejection of independent claim 21 and full allowance of same.

***Examiner's Response to Applicant's Arguments***

The Examiner has indicated that "Chida teaches placing both the low resolution and high resolution images in memory (Column 8, lines 54-65; Column 12, lines 49-55) (See also Figures 1 and 5). . . This would be sequential to the frames that were produced previously." Applicant respectfully disagrees with at least these portions of Examiner's response to Applicant's arguments. The portions of Chida referenced by the Examiner fail to support Examiner's assertion. Chida, in the first embodiment and Figure 2A, discloses dividing an image frame or using image sensing sections without mention of storing sequential frames. *See Col. 6, lines 31-42*. Even though Chida teaches storing image sections, it clear to one of ordinary skill in the art that storing image sections is not the same as storing sequential frames. Chida also teaches that low resolution images are not stored in order to reduce the data stored; only high resolution sections that update an image are stored. *See Col. 11, line 63 to Col. 12, line 19*.

All rejections having been addressed, and in view of the foregoing, the claims are believed to be in form for allowance, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he or she is kindly requested to contact the undersigned at the telephone number listed below.

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Date: Nov 28, 2005Respectfully submitted,  
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